Bradford J. Sandler (NY Bar No. 4499877)
Ilan D. Scharf, Esq. (NY Bar No. 4042107)
Jason S. Pomerantz, Esq. (CA Bar No. 157216)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777

Counsel to Plaintiff RDC Liquidating Trust

## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST,

Plaintiff,

v.

TRACELINK INC.,

Defendant.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 22-02035-PRW

## THIRD STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC ("Plaintiff" or the "RDC Liquidating Trust"), successor in interest to Rochester Drug CoOperative, Inc. ("Debtor"), and defendant Tracelink Inc. ("Defendant" and, together with Plaintiff, the "Parties"), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the "Complaint") against Defendant;

DOCS\_LA:343677.1 75015/003

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;

and

WHEREAS, on February 22, 2022, the Parties entered into a stipulation (the "First

Stipulation") by which the time required for Defendant to answer the Complaint was extended

through and including April 15, 2022. The First Stipulation was approved by order entered

February 25, 2022.

WHEREAS, on April 14, 2022, the Parties entered into a stipulation (the "Second

Stipulation") by which the time required for Defendant to answer the Complaint was further

extended through and including May 13, 2022. The Second Stipulation was approved by order

entered April 18, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and, in response to the

Defendant's request, have agreed, subject to Court approval, to further extend the time for the

Defendant to answer the Complaint to and including June 15, 2022.

[Remainder of Page Intentionally Left Blank]

2

All other terms set forth in the First Stipulation and Second Stipulation remain in full 2. force and effect. Dated: May \( \sum\_{2022} \) Dated: May 1 2022 PACHULSKI STANG ZIEHL & JONES LLP GOODWIN PROCTER, LLP /s/ Ilan D. Scharf Ilan D. Scharf (NY Bar No. 4042107) 5520861) Aftern Skorostensky (NY B The New York Times Building Jason S. Pomerantz (CA Bar No. 157216) 780 Third Avenue, 34th Floor 620 Eighth Avenue New York, NY 10017 New York, NY 10018 Telephone: (212) 561-7700 Telephone: (212) 813-8800 Email: ischarf@pszjlaw.com Email: askorostensky@goodwinlaw.com jspomerantz@pszjlaw.com Counsel to Defendant Tracelink Inc. Counsel to Plaintiff RDC Liquidating Trust SO ORDERED: DATED: 2022 Rochester, New York HON. PAUL R. WARREN

United States Bankruptcy Judge